

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**ELECTRONIC SCRIPTING  
PRODUCTS, INC.,**

Plaintiff

v.

**EQ3 LTD,**

Defendant

**Case No. 6:23-cv-00194-ADA-DTG**

**JURY TRIAL DEMANDED**

**MOTION FOR ENTRY OF DEFAULT**

Plaintiff Electronic Scripting Products, Inc. ("Plaintiff") respectfully moves for entry of a default against Defendant EQ3 LTD ("Defendant"). In support of this motion, Plaintiff shows as follows:

1. On March 14, 2023, Plaintiff filed a Complaint for Patent Infringement against Defendant. ECF No. 1.
2. Defendant was duly served with a copy of the Complaint and Summons on March 23, 2023, as set forth in the filed Proof of Service. ECF No. 8.
3. More than twenty-one (21) days have elapsed since Defendant was served. To date, Defendant has failed to answer, plead, or otherwise defend the allegations of Plaintiff's Complaint.
4. Pursuant to Federal Rule of Civil Procedure 55(a), a default must be entered against a party against whom a judgment of affirmative relief sought when that party has failed to plead or otherwise defend the action.

5. Because Defendant has failed to plead or otherwise defend this action, Plaintiff respectfully requests that the Clerk of Court enter a default against Defendant.
6. In support of this request, Plaintiff relies upon the record in this case and the affidavit submitted herein.

WHEREFORE, Plaintiff respectfully requests that the Clerk of Court enter a default against Defendant pursuant to Federal Rule of Civil Procedure 55(a).

Dated: June 6, 2023

Respectfully submitted,

/s/ *Raymond W. Mort, III*

Raymond W. Mort, III

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